

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Texas

United States of America)

v.)

JOSE MENDOZA, JOSE GONZALEZ,
RODOLFO VELAZQUEZ, JUAN NAVARRO, and
ROBERTO VASQUEZ)

Case No. SA-10-M-752 (1-5)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 11, 2010 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:

Code Section

21 U.S.C. Sections 846, 841(a)(1)
& 841(b)(1)(A)

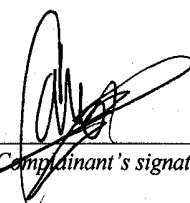
Offense Description

Conspiracy to Possess and Possession with Intent to Distribute 5 kilograms
or more of Cocaine a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

See Attachment "A"

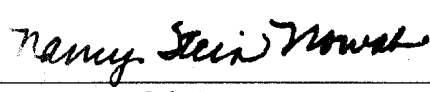
☒ Continued on the attached sheet.


Complainant's signature

JUAN CANO, S/A DEA
Printed name and title

Sworn to before me and signed in my presence.

Date: 08/12/2010


Judge's signature

City and state: SAN ANTONIO, TEXAS

NANCY STEIN NOWAK U.S. Magistrate Judge
Printed name and title

ATTACHMENT "A"

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

JUAN CANO, BEING DULY SWORN, DEPOSES AND SAYS:

I am a Special Agent with the Drug Enforcement Administration (DEA), currently assigned to the San Antonio District Office in San Antonio, Texas. In addition to the basic law enforcement training I have also received advanced training regarding the controlled substance laws of the State of Texas and the United States. I have in the past been the affiant on affidavits in support of arrest warrants and complaints in federal courts.

On August 11, 2010, at approximately 4:15 pm, a DEA Confidential Source (CS) agreed to meet with Rodolfo VELASQUEZ at the Shell gas station, 20115 South Highway 281, San Antonio, Bexar Co., Texas, regarding the purchase of twenty (20) kilograms of cocaine. Surveillance agents observed VELASQUEZ operating a maroon Mitsubishi, Texas 731-BWN, with a Hispanic male, later identified as Jose MENDOZA, occupying the front passenger seat, arrive at the Shell. Surveillance agents observed VELASQUEZ exit the Mitsubishi and meet with the CS. The CS requested to

observe the cocaine. Agents observed VELASQUEZ and MENDOZA depart the Shell and travel to 1340 Green Gate Drive, San Antonio, Texas. Agents observed MENDOZA exit the Mitsubishi and carry a white bag before entering the front passenger seat of the Mitsubishi. Agent observed the Mitsubishi occupied by VELASQUEZ, MENDOZA and another male individual, later identified as Jose Luis GONZALEZ Jr. who was occupying the rear passenger seat, travel back to the Shell. Agents observed VELASQUEZ exit the Mitsubishi and walk around to the front passenger door/window and obtain a white bag before meeting with the CS by the CS' vehicle. Agents observed VELASQUEZ walk back to the front passenger seat of the Mitsubishi and provide the bag to MENDOZA. Agents observed GONZALEZ exit the Mitsubishi, utilizing the rear passenger door, and occupy the driver seat. The CS contacted SA Juan Cano, via telephone and notified him about the white bag containing two (2) kilograms of cocaine. Agents observed GONZALEZ drive around the gas pump prior to agents arresting both GONZALEZ and MENDOZA. Agents also arrested VELASQUEZ who was sitting on the driver side rear passenger seat of the CS's vehicle. After Miranda rights were read to VELASQUEZ, he provided agents with a signed consent to search form for, 1340 Green Gate Drive, San Antonio, Texas, as witnessed by SA Cano and

Task Force Officer (TFO) Mark Rodriguez. Agents traveled to 1340 Green Gate Drive, San Antonio, Texas, and detained Juan Armando NAVARRO and Roberto VASQUEZ. Agents discovered an additional five (5) kilograms of cocaine in plain view on a table top in the living room area.

VELASQUEZ also provided a statement indicating that VELASQUEZ was in contact with VASQUEZ regarding the sale of seven (7) kilograms of cocaine. VELASQUEZ indicated that VASQUEZ agreed to deliver the cocaine to VELASQUEZ's residence on August 11, 2010. VELASQUEZ was to deliver the cocaine to the buyer (DEA CS) and receive the monies for the cocaine.

After Miranda rights were read to NAVARRO, he provided a statement indicating that he was directed by Javier LNU to drive a maroon Chevrolet Tahoe from Del Rio, Texas to the San Antonio, Texas area and contact "PRIMO", later identified by NAVARRO as Jose Luis GONZALEZ Jr., via cellular telephone. NAVARRO indicated he agreed to meet with GONZALEZ and MENDOZA in a bank parking lot in San Antonio, Texas. After meeting with GONZALEZ and MENDOZA, NAVARRO was directed by GONZALEZ to follow him and MENDOZA to 1340 Green Gate, Drive, San Antonio, Texas. NAVARRO further stated that once at the residence, VASQUEZ, MENDOZA and VELASQUEZ observed GONZALEZ retrieve multi-kilograms of

cocaine from the center console area of a maroon Chevrolet Tahoe. NAVARRO stated that once the cocaine was retrieved from the Chevrolet, GONZALEZ, VASQUEZ and VELASQUEZ agreed the monies of the sale of the cocaine would be concealed within the same hidden compartment where the cocaine was retrieved. NAVARRO stated that once the monies were concealed in the Chevrolet, NAVARRO was to travel back Del Rio, Texas until further instructions were provided.


After Miranda rights were read to GONZALEZ, he provided a statement indicating he occupied the rear seat of a maroon car, identified by agents as a Mitsubishi with Texas 731-BWN, along with VELASQUEZ (driver) and MENDOZA (front passenger). GONZALEZ stated that VELASQUEZ placed the cocaine in the front passenger floor board of the Mitsubishi prior to traveling to the Shell gas station, 1604 and 281, parking lot. GONZALEZ stated that once at the Shell, VELASQUEZ exited the Mitsubishi and walked around to the front passenger door and received two (2) kilograms of cocaine from MENDOZA. GONZALEZ stated he exited the Mitsubishi and occupied the driver seat. GONZALEZ stated VELASQUEZ gave the cocaine to MENDOZA prior to GONZALEZ driving the Mitsubishi around the gas pumps and being arrested by agents.

Further Affiant sayeth not.



SA JUAN CANO, DEA

Subscribed and sworn to on this the 12th day of August,
2010.



NANCY STEIN NOWAK
UNITED STATES MAGISTRATE JUDGE